THE REGIONAL MUNICIPALITY OF

Halton

STAFF REPORT

*

DAY NURSERIES SERVICES

*

PROPOSED STANDARDS AND GUIDELINES

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INTRODUCTION

In early 1980 the Ministry of Community and Social Services, Children's Services Division, prepared and circulated a proposal under date of February, 1980 entitled "Day Nursery Services: Proposed Standards and Guidelines, 1980". This proposal was circulated generally to municipalities, private operators and to municipal associations.

In general, we support the standards and guidelines as they will assist operators throughout Ontario in providing quality service for children in the Day Nurseries field. We endorse the move by the Ministry of Community and Social Services to license agencies operating private home day care and feel that this will enhance the quality of care provided in the private home and improve the profile of the Private Home Day Care Program.

While supporting the proposals there are certain areas of concern which we feel need clarification and/or deletion or addition of particular items.

The Provincial Proposed Standards are to be considered mandatory conditions for licensing, while guidelines will describe desired levels of performance and that at this time will not be mandatory.

Copies of the Day Nurseries Services: Proposed Standards and Guidelines, and the response paper prepared by O.M.S.S.A. are available through the Day Care Division, Department of Social Services.

SUMMARY

The report is divided into two sections. Section One comments on Proposed Standards which will become Provincial Policy and a mandatory condition for licensing day nurseries. The focus of this report is on section one. Section Two comments briefly on key guidelines which describe desired levels of performance and at this time will not be mandatory.

Of particular interest are: *1) Standards relating to group size and Child/Staff ratios (see page 3 and appendix 1); 2) Standards on the administering of Medications to children in day care centres (see page 11, PS-06.8 and .9); 3) Standards on staff competencies (see page 21, HRS-12.2); 4) Standards for P.H.D.C. agencies (see pages 35-58) and 5) Standards for Day Nurseries for Children with special needs (see page 59-66).*

In addition to the comments which we have made in this report, there are a few areas we feel need comment on - those which do not appear as standards or guidelines but are factors.

Where the Day Nursery Services - Proposed Standards and Guidelines, 1980, necessitate increased operating costs, the Ministry of Community and Social Services must be prepared to make available appropriate funds.

The Ministry's present position regarding prior approval when expending funds for a single item in excess of a maximum of $300.00 is both inappropriate, time consuming and unnecessary. Municipalities currently submit their budgets to the Province for approval. Where items appear in there and have been seen and approved by the Ministry, no further approvals should be required. On other items the Ministry needs to seriously consider increasing the amount expended from a maximum of $300.00 to an amount of $1,000.00.

We presume that application for a license of a day nursery program applies to new operations. Municipalities licensed under the current Day Nurseries Act, 1980 should not be subject to excessive cost or time consuming paper work where institutional, or private home day care programs are already in existence. Consideration will also have to be given to the cost implications in respect to the new licensing according to the ages of the children. The day care centres are presently licensed to have children start at age two. If the age is lowered to 18 months under the new standards, the cost involved in additional staffing and renovating of some centres and programs is a necessary consideration.

There is discussion in the standards of a review team including a parent or staff member of a Community College. While we can certainly agree with the review team, many Community Colleges operate day nurseries and are affected by these standards and by the forthcoming legislation. We would recommend that, if a review team is set, that persons sitting on the team would not be operators of day nursery centres. This review team should be composed of persons who are not involved in a competitive or similar service. In addition, guidelines will have to be established for the team.

At the risk of being repetitive we again must stress to the Province that new legislation and regulations must be circulated in a draft form for review by the municipalities and for input and comment prior to their implementation. The Province must provide the cost analysis requested both in this report, by other municipalities and by O.M.S.S.A. regarding the impact of certain specific standards on municipal budgets.

Finally, if the standards are implemented and if municipalities are faced with additional costs, then the Province of Ontario must undertake to guarantee that no subsidy ceilings will be applied that would shift the burden of implementation from a cost shared to a 100 per cent municipal base.

SECTION I

PROPOSED STANDARDS
DAY NURSERIES SERVICES

THE PROGRAM

STANDARD

PS-01.1 (p.23)

"Every operator of a day nursery shall have a written statement outlining the program philosophy and method of operation of each of its nursery programs, and this statement shall be readily available upon request. This statement shall specify:

a) the children who may be enrolled in terms of age range, handicaps, if any, and the number by age and handicap.
b) the length of operating day, week and year.
c) the particular approach to programming that is followed, including;

i) philosophy
ii) daily program schedule or timetable
iii) individual program plans for handicapped children
iv) personal care
v) parental involvement
vi) behaviour and guidance
vii) specialized services

COMMENT

Staff support this standard and while we do not provide as detailed a written statement on our program philosophy as is required by this standard, we currently do provide a similar standard of intent and would be fully prepared to support and comply with this standard.

* * *

STANDARD

PS-02.1 (p.24)

"Every day nursery operator shall establish a written daily program schedule for each day nursery operated. The schedule shall be posted in the day nursery and available for inspection at all times. Major deviations from the schedule or timetable shall be recorded in the daily log.

COMMENT

We currently operate under this standard and would see no change in its implementation.

* * *

STANDARD	COMMENT
PS-03.1 (p.24) "The daily program schedule shall include but not necessarily be limited to the following: a) group and individual activities b) activities designed to provide gross and fine motor, cognitive, social and emotional development. c) active and quiet play.	Again this is currently being done in our centres.

* * *

STANDARD	COMMENT
PS-02.3 (p.24) "There shall be provision in the schedule so that: a) children not yet able to walk are separated from other children during play periods. b) children under six years of age are separated from older children during play periods.	While we currently do not have any children in the day care centres who are unable to walk (excepting handicapped), we would support item a). Presently there are not enough six year olds in our centres to substantiate implementation of item b), but we do support this item.

* * *

STANDARD

PS-02.4 (p.24)

"Every child more than two years of age in attandance for a full day shall play outdoors for at least two hours each day, weather permitting, unless a physician advises otherwise.

COMMENT

We do not support this statement in its entirety. We would recommend that if a child is well enough to attend the day nursery program he should be well enough to participate in all areas of the program and in all activities including outdoor activities. If a child has a physical illness that requires him to be excluded from the programs, we feel that the child should not be in attendance at the school.

STAFF RECOMMENDATIONS

That the standard be amended to read as follows:

> Each child more than two years of age in attendance for a full day shall play outdoors for at least two hours each day, weather permitting.

* * *

STANDARD

PS-02.5 (p.24)

"The program of a day nursery shall provide for the grouping of children in accordance with the limits set out in Schedule 1 (see Appendix I)

COMMENT

This is probably one of the more controversial aspects of the report. The Province have acknowledged in their introduction to the standards and guidelines of human resources, that it is likely to create the most controversy. The groupings proposed under this standard create age groups of birth to eighteen months, eighteen months to thirty months, two and one half years to five years. The current Regional policy is to admit children to the program at two years (24 months) of age. Examining the current enrollment of our centres we noted

PS-02.5 (p.24)

COMMENT (cont'd)

that they had a total licensed capacity of 114 and an enrollment of 114 children as of June 1, 1981. Of these, nine children were under two and a half years of age. Under the proposed standard, this would require a) that for this group alone we would have to hire one additional staff, b) alternatively, these children could be transferred to the private home day care program where we would have to pay the current daily rate while still having to maintain our current staff ratio at the day care centres. We are understaffed under the proposed standard.

STAFF RECOMMENDATIONS

That the Province of Ontario again review their standards on grouping of children and that they thoroughly review cost implications with municipalities before implementation of this standard.

* * *

STANDARD

PS-03.1 (p.25)
"A day nursery for children less than 18 months of age shall:

a) establish sanitary procedures for changing diapers
b) use disinfectant for sanitizing changing and eating surfaces, toys and other objects handled by the children.

COMMENT

The proposed standard makes no reference to specific requirements, ie whose standard?

STAFF RECOMMENDATIONS

Recommended that the standard be amended by adding thereto a further sub paragraph (c) as follows:

c) that the sanitary procedures being established be approved by the local medical officer of health.

* * *

STANDARD

PS-03.2 (p.26)

"A day nursery for children from 18 months of age to 30 months of age shall establish a sanitary procedure for changing diapers.

COMMENT

As in the previous proposal this should have reference to a specific quality standard.

STAFF RECOMMENDATIONS

That a further sub paragraph be added requiring that procedures to be approved by the local officer of health.

* * *

STANDARD

PS-03.3 (p.26)

"Each child shall have a personal wash cloth and towel, or the day nursery shall supply disposal wash cloths and towels.

COMMENT

This standard is currently being met in our centres and we support it.

* * *

STANDARD

PS-04.1 (p.26)

"The program schedule shall include the provision for each child under the age of 18 months in attendance for a full day session to sleep or play outdoors for up to two hours when the weather is suitable unless a physician advises otherwise.

COMMENT

We feel that the words "unless a physician advises otherwise" should be deleted from this standard. It is our feeling that this is inappropriate legislation. If a child is well enough to attend the day nursery, he should be well enough to participate in all areas of the program, including outdoor activities. If he is not physically well enough to partake of the outdoor activities, then he should not be in the school and should be kept at home by the parent.

STAFF RECOMMENDATIONS

We therefore recommend that this standard stop after the word "suitable".

* * *

STANDARD

PS-04.2 (p.26)

"The program schedule shall include provision for each child between the ages of 18 months and 30 months, both ages inclusive, in attendance for a full-day session to have a rest period of one hour."

COMMENT

It is our feeling that a rest period of only one hour is not sufficient for a child under 30 months of age. Some children are in attendance in the centres for nine hours a day and one hour rest period can be inappropriate.

STAFF RECOMMENDATION

The program schedule shall include a provision for each child between the ages of 18 months and 30 months, both ages inclusive, in attendance for a full day session to have a rest period of not less than one hour and not more than two hours.

* * *

STANDARD

PS-04.3 (p.26)

"The program schedule shall include provision for each child between the ages of 30 months and five years, both ages inclusive, in attendance for a full day session to have a rest period of 30 minutes to one hour."

COMMENT

As in PS-04.2 it is again our feeling that a rest period of one hour is inappropriate.

STAFF RECOMMENDATION

The program schedule shall include provision for each child between the ages of 30 months and five years, both ages inclusive, in attendance for a full day session to have a rest period of not less than 30 minutes and not more than two hours.

* * *

PS-05.1 (p.26) STANDARD	COMMENT
"Each day nursery shall have a written menu and shall serve food that conforms to the provisions of Canada's Food Guide issued by Health and Welfare Canada."	The previous regulations under the Act required that a hot meal be served. This requirement is now removed and the meal must now conform to a national nutritional food guide as a minimal guide. Current practices in our day care centres are to follow, as closely as possible, the Canada Food Guide.

* * *

PS-05.2 (p.26) STANDARD	
"The day nursery shall provide: a) feedings to each infant under one year of age in accordance with written instructions from the parent or guardian regarding type and scheduling, to meet the nutritional needs of the infant during the period of attendance. b) meals for each child more than one year of age who attends the program for more than four hours per day. c) between-meal snacks for all children more than one year of age according to Canada's Food Guide. d) amounts equal to one-third of the required daily intake."	The new standards follow current standards in our private home day care program.

* * *

STANDARD

PS-05.3 (p.27)

"Written menus for children attending a day nursery shall be planned at least two weeks in advance and shall be posted in the nursery and available for inspection at all times. Deviations from planned menus shall be documented in writing in the daily log."

COMMENT

Our day care centres currently prepare menus one month in advance and post written menus weekly. We will be able to easily comply with this standard.

* * *

STANDARD

PS-06.2 (p.27)

"A daily inspection of every child in the day nursery shall be made by a member of the program staff, before the child begins to associate with other children to detect symptoms of ill health, communicable disease and child abuse; any of these symptoms shall be noted in the daily log."

COMMENT

The word "inspection" in this standard sounds too severe and could be misinterpreted. We recommend that the word "observation" be substituted.

STAFF RECOMMENDATION

That the standard read "A daily observation of every child in the day nursery shall be made by a member of the program staff, before the child begins to associate with other children to detect symptoms of ill health, communicable disease and child abuse; any of these symptoms shall be noted in the daily log".

* * *

STANDARD

PS-06.3 (p.27)

"Suspected cases of child abuse shall be reported immediately as required by The Child Welfare Act, 1978."

COMMENT

There is little comment to be made on this as it is a legal requirement under the Child Welfare Act.

Supported.

* * *

STANDARD

PS-06.4 (p.27)

"Any child in a day nursery who develops symptoms of serious illness shall be encouraged to remain in a quiet, supervised area designated for rest and care, until the child can be examined by a licensed physician or a nurse registered under The Nurses Act, or until the parent or guardian can take the child home."

COMMENT

If a child develops symptoms of a serious illness, he must remain in a quiet, supervised area for his own health and the benefit of others.

STAFF RECOMMENDATION

That the standard be re-written to delete the words "be encouraged to" and would then read as follows:

"Any child in a day nursery who develops symptoms of a serious illness shall remain in a quiet, supervised area designated for rest and care, until the child can be examined by a licensed physician or a nurse registered under The Nurses Act, or until the parent or guardian can take the child home.

* * *

STANDARD

PS-06.5 (p.28)

"Where a serious accident, illness or death occurs to a child in a day nursery, the supervisor shall promptly -

a) obtain all necessary emergency medical assistance
b) notify the parent or guardian of the child
c) record the occurrence in the daily log
d) notify the Ministry"

COMMENT

This particular standard requires some clarification. We would recommend that further clarification on the word "serious" is needed. We also feel that time frames may be necessary for notification of the Ministry as it will not always be feasible due to varying hours of operation, to immediately notify them. The matter should also be clarified as to whether the notification must be verbal, written or both.

STAFF RECOMMENDATION

"Where an accident, illness or death occurs to a child in a day nursery, the supervisor shall -

a) immediately obtain all necessary emergency medical assistance

PS-06.5 (p.28)

STAFF RECOMMENDATION (cont'd)

b) promptly notify the parent or guardian of the child
c) record the occurrence in the daily log
d) in the case of accident or illness notify the Ministry within 48 hours in writing and in the case of death to notify the Ministry immediately by phone and within 48 hours to communicate in writing the details of the occurrence."

* * *

STANDARD

PS-06.6 (p.28)

"Every day nursery shall keep available for emergency treatment on the premises a first-aid kit."

COMMENT

We feel that this standard should be expanded to specify the type of first-aid kit required on the premises. I.E. should the minimum first-aid kit be equivalent to a W.C.B. 200 series.

STAFF RECOMMENDATION

Every day nursery keep available for emergency treatment on the premises a first-aid kit, type _____.

* * *

STANDARD

PS-06.7 (p.28)

"At all times there shall be at least one person on the premises of the day nursery who holds a current Red Cross or standard St. John Ambulance certificate in first aid."

COMMENT

We are in support of this agreement but do feel that some latitude must be required in this standard to allow those municipalities or private operations to avail themselves of the necessary courses to upgrade their staff. The definition of a "current" Red Cross certificate may be required but generally we support this recommendation.

* * *

STANDARD

PS-06.8 (p.28)

"The supervisor of a day nursery shall ensure that:

a) only those drugs and medications recommended in writing by a licensed physician are administered to a child attending a day nursery.

b) all containers of any drug or medication to be administered to a child are clearly labelled with the child's name and instructions for the administration of the drug or medication.

COMMENT

In addition to issuing this standard, we feel that the Ministry should also develop guidelines to keep drugs and their administration to a minimum at the day care centres. We also feel that all labels on drugs in addition to the child's name should contain the name of the drug, the name of the doctor and the date that the prescription was issued.

STAFF RECOMMENDATION

That paragraph b) of this standard be amended to read:

All containers of any drug or medication to be administered to a child are clearly labelled with the name of the doctor, the date the prescription was filled, with the child's name, the name of the drug and instructions for the administration of the drug or medication.

* * *

STANDARD

PS-06.9 (p.28)

"The supervisor of a day nursery shall:

a) ensure that a daily record, signed by the supervisor or person having custody of the keys, is kept of all prescription drugs and medications, showing the amount dispensed and the amount on hand, and in addition, that records are kept of all controlled drugs as required under The Narcotic Control Act (Canada).

b) establish a procedure as directed by a nurse registered under The Nurses Act or by a licensed physician for the administration of any

COMMENT

While this standard will require a minor update to our current policy and considerably tighten the requirements for the handling of drugs, we are fully supportive of it.

PS-06.9 (p.28)

STANDARD (cont'd)

drug or medication prescribed by a licensed physician for any child enrolled.

c) ensure that drugs and medications are kept in a locked cupboard, and the keys to the cupboard are kept under custody of the supervisor or the custody of some other employee of the nursery designated by the supervisor.

d) ensure that the person having custody of the keys is responsible for the removal of any drugs or medications from the cupboard and for their administration in accordance with the procedure established under part b) above. Where drugs and medication must be refrigerated, the supervisor shall be responsible for their storage and administration in accordance with part b) and this part of the standard.

* * *

STANDARD	COMMENT
PS-06.10 (p.29) "Where there are dogs and cats in a day nursery the operator shall ensure that these animals are properly protected against rabies."	Dogs and cats may be found and brought into day care centres but it is more likely that other animals such as birds, etc., are on the premises for longer periods of time and we would therefore recommend that while PS-06.10 could stand as it is protecting against rabies, that it could be expanded. (cont'd)

PS-06.10 (p.29) cont'd

STAFF RECOMMENDATION

Where there are dogs and cats in a day nursery, the operator shall ensure that these animals are properly protected against rabies and that all children in the centre are properly protected against communicable diseases from any other animal brought into a day nursery.

* * *

STANDARD

PS-07.1 (p.29)

"Every operator of a day nursery shall have a written policy with respect to behaviour management practices permitted or prohibited by staff."

COMMENT

We currently have a written policy with respect to this which is closely followed. In some areas, it exceeds the standards set down.

* * *

STANDARD

PS-07.2 (p.29)

"The following forms of discipline shall not be used:

a) corporal punishment, including but not limited to the following:

i) striking a child, directly or with any physical object
ii) shaking, shoving, spanking or other forms of agressive contact
iii) requiring or forcing the child to repeat physical movements

b) harsh, humiliating, belittling or degrading responses of any form, including verbal, emotional and physical.

COMMENT

We are in agreement and support the standard.

* * *

STANDARD	COMMENT
PS-08.1 (p.30) "The operator of a day nursery shall keep on the premises of the day nursery records maintained up to date and available for inspection at all times that shall include in respect to every child enrolled - a) an application for enrolment signed by the parent or guardian or the child b) the name, date of birth and current home address of the child c) the names and current home addresses of the parents or guardians of the child d) the current place at which a parent or guardian, or alternate person to whom the child may be released, can be reached in case of an emergency during the hours when the child is in the day nursery e) the name and address of the family physician of the child f) the date of admission of the child g) the date of discharge of the child h) a record of the daily attendance of the child i) a record of the growth of every child who is under 18 months of age j) measurement of the height and weight of each child over 18 months every six months k) a historical and ongoing record of the child's communicable diseases and immunization l) with respect to medications, a recommendation in writing signed by a licensed physician for any medical	We are in agreement with the items listed in this standard. (cont'd)

PS-08.1 (p.30)

STANDARD (cont'd)

treatment or medication for the child which is to be administered during the hours the child is in the day nursery

m) with respect to any special requirements for diet, rest or exercise, a recommendation in writing signed by a licensed physician.

* * *

PS-08.2 (p.31)

STANDARD

"Every day nursery shall keep on its premises records of visits of inspection made by the local medical officer of health or any person designated by him or her, the local fire department and any person designated as a program advisor under subsection 1 of section 16 of The Day Nurseries Act, 1978 making an inspection on behalf of the Minister.

COMMENT

To maintain consistency throughout the Provincial document we would recommend that the words "keep on its premises" be deleted and that the words "record in the daily log" be substituted.

STAFF RECOMMENDATION

That the standard be amended to read as follows:

> Every day nursery shall record in the daily log visits of inspection made by the local medical officer of health or any person designated by him or her, the local fire department and any person designated as a program advisor under subsection 1 of section 16 of The Day Nurseries Act, 1978 making an inspection on behalf of the Minister.

* * *

STANDARD	COMMENT
PS-09.1 (p.32) "Every day nursery shall maintain a daily log in which major deviations from the program and written plans are recorded."	The interpretation of what might be a major deviation varies considerably. We recommend that the Ministry define a major deviation so that the log will not be cluttered with insignificant comments. STAFF RECOMMENDATIONS That the Province include in their standards examples of what they feel are major deviations from the program.

* * *

STANDARD	COMMENT
PS-10.1 (p.32) "The operator of the day nursery shall keep personal records of the children confidential and in a locked file."	This currently is our practice and one which we support wholeheartedly.

* * *

STANDARD	COMMENT
PS-10.2 (p.32) "No operator of a day nursery, municipality, band or approved corporation shall disclose publicly either in writing or orally the identity of any person who is eligible for or receives a subsidy."	Some definition of the word 'publicly' could be expanded upon. Is the sharing of information with other agencies public disclosure? If a recipient of day nursery services goes to the press and discloses the fact that she is receiving a subsidized service and the press in turn contact the municipality, can the municipality publicly discuss this in an after the fact manner where the recipient of the service has in effect previously disclosed her receipt of the service.

* * *

PROGRAM STAFF/CHILD RATIOS

STANDARD

HRS-01.1 (p.42)

"The number of program staff, including the supervisor, required for the care and guidance of children whether on the premises or on field trips in a day nursery shall be determined in accordance with schedule I."

COMMENT

This matter was related to under PS-02.5 on the grouping of children. This is a shift in regulatory emphasis toward group size limitations from a staff/child ratio.
The essence of this staff/child ratio is the minimum point at which the frequency and nature of the adult/child interactions are conducive to the positive care, guidance and development of the child.
The Province's rationale in this area is based on the National Day Care Centres Study which showed that the effects of staff/child ratios were minor when compared to group size. Of the three interrelated factors; group size, staff/child ratio and care giver qualifications, group size was considered to be the most important factor effecting the behaviour of children. No one of these critical variables however, can be viewed in isolation. To be effective, the standard should specify configurations of children and care givers including minimum qualifications for care givers. Group sizes and staff/child ratio vary by time of day, type of activity, season, and often by children's ages. Therefore, when the standards themselves must be specific, monitoring and enforcement practices must be flexible.
Previously group size was controlled only through regulations which limited classroom (space size). These classroom sizes however generally permit group sizes which exceed the limits recommended under these standards.
These new standards limiting group size will have to be viewed and used with care and must take into account existing space in day nurseries and the effect these ceilings will have on

HRS-01.1 (p.42) cont'd

COMMENT (cont'd)

separate programs, costs and indirectly may result in reduced day care spaces in certain areas.
The staff totally supports O.M.S.S.A.'s position that current staff/child ratios lack uniformity in that the minimum standard varies for the same age grouping depending on group size. The larger the group size, the less stringent the staffing complement. This lack of uniformity is both unfair and more costly for smaller centres.
The proposed standards limiting group size and suggesting ratios which will be expressed uniformly will have an overall impact that will result in an increase in the number of staff required in larger centres while in smaller centres the ratios will decrease.

STAFF RECOMMENDATION

That the Ministry be requested to review these proposals and to provide illustrations regarding the cost implications of the proposed standards prior to their implementation.

* * *

STANDARD

HRS-01.2 (p.42)

"The number of program, staff, including the supervisor, required in a day nursery, when the centre has an enrollment of 45 or fewer children, shall be calculated on the basic average monthly enrollment of children per group in each program offered."

COMMENT

This standard is proposing an enrollment based system which would take into account absenteeism of children. Using a natural or average attendance based system has a number of practical difficulties at the centre level and is far too difficult to monitor. Accordingly we would endorse the monitoring of ratios based on enrollment at levels that account for absenteeism.

(cont'd)

HRS-01.1 (p.42) cont'd

STAFF RECOMMENDATION

We endorse the monitoring of ratios based on enrolment at levels that account for absenteeism.

* * *

STANDARD

HRS-01.3 (p.42)

"There shall be a minimum of two program staff on the premises of a day nursery at all times while there are six or more children in attendance, or where there are infants (under 18 months) three or more infants in attendance."

COMMENT

We support this standard which will require part-time supply staff to maintain correct child/staff ratios especially at the end of the day.

* * *

STANDARD

HRS-01.4 (p.42)

"The ratios required apply at all times children are in attendance except during the periods of arrival, departure, rest, and playground activity in which case the observed ratio with the children can never be less than two-thirds of the required ratios as determined in Schedule I."

COMMENT

We agree with O.M.S.S.A. when they stated that this leaves very little of the day when the children require the ratio suggested in the schedules. Outdoor active play requires very close supervision. As well, the arrival and departure times are very important for one to one contact with the child and with the parent who may be bringing the child.

* * *

STANDARD

HRS-01.5 (p.42)

"Children in a day nursery shall not at any time be left without program staff supervision."

COMMENT

This is a common sense approach and is supported.

* * *

STANDARD	COMMENT
HRS-12.1 (p.56) "The operator of every day nursery shall employ for the care and guidance of each group of children, as defined in Schedule I, a program staff person who has completed a program in early childhood education or has equivalent competencies, and whose training is appropriate to the ages and developmental level of the children enrolled."	The discussion paper recommends the competency base for evaluating staff, training and development rather than education and work experience. The competency based approach is set-job-requirements that specify what a person must be able to do in order to perform a job adequately as opposed to a more common practice of basing qualifications on education and work experience. The Province considers the education and work experience to be indirect indicators of the qualifications to do the job whereas the competencies would be direct indicators. They point out that education does not guarantee full competency in vocation and support this by stating that academic programs do not always equip the graduates with practical work skills relating to the actual performance of the job and further that the content and scope of the degree or diploma granting programs may vary from one institution to another and finally that knowledge or conceptual information may not be directly linked to the competencies required to perform the job, and consider work experience as an asset only if it has been a positive experience where the worker was given the opportunity to learn and practice competencies in an environment where care and good quality is provided or where the competencies are directly related to the ages and unique developmental differences of young children. In practice, municipalities or agencies hiring staff will generally have to rely on the educational and work experience history of the applicant when hiring them. In the Province's 1,350 day nurseries there are (cont'd)

HRS-12.1 (p.56) cont'd

COMMENT (cont'd)

approximately 6,650 program staff employed of whom approximately 69 per cent or 4,610 have an E.C.E. diploma or its equivalent diploma. It is quite obvious that the Province will have to undertake the development of a training program compatible with a competency based approach and will certainly have to work with the Ministry of Colleges and Universities so that those schools providing Early Childhood Education are aware of this change in direction.

* * *

STANDARD

HRS-12.2 (p.56)

"The operator of every day nursery shall employ a supervisor who has:

a) completed a program in early childhood education or who has equivalent competencies, and
b) at least two years' experience in a day nursery(ies) appropriate to the age and developmental levels of the children enrolled.

COMMENT

In this standard, as in HRS-12.1, we are concerned with the equivalent competencies definition.

* * *

STANDARD	COMMENT
HRS-13.1 (p.57) "Every member of the staff of the day nursery, before commencing employment and every two years thereafter, shall be examined by a licensed physician and shall obtain from the physician a certificate that the staff member is free from communicable diseases, has had immunization deemed adequate by the local medical officer of health including immunization for rubella, and has had a test for tuberculosis that shows negative results."	Because staff are in daily contact with the children and the public we feel the present standard of an annual medical should not be lowered. **STAFF RECOMMENDATION** That every member of the staff of the day nursery, before commencing employment and every year thereafter, shall be examined by a licensed physician and shall obtain from the physician a certificate that the staff member is free from communicable diseases, has had immunization deemed adequate by the local medical officer of health including immunization for rubella, and has had a test for tuberculosis that shows negative results.

* * *

STANDARD	COMMENT
PPS-01.1 (p.62) "No premises shall be used as a day nursery until a letter has been received from: a) the local medical officer of health stating that the premises comply with the laws affecting the health of inhabitants of the municipality or reserve of a band, as the case may be, in which the day nursery is located, including any rule, cont'd	We support this standard with one minor amendment. Under item c) we would recommend that this be changed so that the person would not be designated by the clerk but by the council of the municipality. In some municipalities building and zoning by-law officers and approved by municipal by-law and are therefore directed by council and not designated by the clerk of the municipality.

PPS-01.1 (p.62) cont'd

STANDARD (cont'd)

regulation, direction or order of the local board of health and any direction of the local medical officer of health.

b) the local fire chief stating that the premises meet all the requirements of any statute, regulation or by-law relating to the protection from fire of persons using the premises.

c) the local clerk or the municipal council or a person designated by the clerk or the chief of the council of a band, stating that the premises comply with any zoning or building or other by-laws passed by the municipality or the council of the band, as the case may be.

STAFF RECOMMENDATIONS

c) the local clerk of the municipal council or a person designated by the council of the municipality or the chief of the council of the band, stating that the premises comply with the zoning or building or other by-laws passed by the municipality or the council of the band, as the case may be.

* * *

PPS-01.2 (p.63) STANDARD

"Before a new building is erected or an existing building is used, altered or renovated for use as a day nursery, the plans, including those of the playground area, shall be approved by the Ministry."

COMMENT

We have no problem in accepting this standard.

* * *

PPS-01.3 (p.63) STANDARD

"A building to be used as a day nursery, whether new or to be renovated, with a planned capacity of more than 80 children, must receive approval of the Ministry subject to additional terms and conditions than prescribed by the Regulations.

COMMENT

We have no problem in supporting this standard.

* * *

STANDARD	COMMENT
PPS-02.1 (p.63) "Every day care centre and developmental centre shall have a minimum outdoor play space of 5.5 square metres for each child enrolled where licensed capacity does not exceed 64 children. Where licensed capacity exceeds 64 children: a) the playground shall be used by a group limited to 64 children at one time, or b) the playground area shall be increased in size in proportion to the licensed capacity, and divided by a fence so that each playground area provides space for use by 64 children or fewer at any one time.	Current regulations do not explicitly state that a playground is required. The standard proposed does not clarify how existing centres without or with limited outdoor play areas are able to meet this standard for license renewal. Either the Province intends to quickly phase out all centres which do not have outdoor play areas or insufficient playground areas or a grandfather clause will have to be enacted to exempt currently licensed centres who do not meet this requirement. We also feel that a playground should not be used by more than 45 children at one time as it would be far too difficult to supervise 64 children in one play area considering the activity and the mobility that can go on. We would therefore agree with O.M.S.S.A. we would also suggest that the basic number of children permitted on the playground at any one time be limited to 45 and further we support O.M.S.S.A. in its position that a guideline be introduced which recommends that the surface under swings not be paved.
* * *	
STANDARD	COMMENT
PPS-02.2 (p.64) "Every playground shall be: a) fenced on all sides to a minimum height of 1.2 metres so that children will be confined to the playground b) furnished with gates equipped with bolts and securely fastened at all times."	We currently meet this standard and would support this proposal.
* * *	

STANDARD	COMMENT
PPS-02.3 (p.64) "Every playground shall be drained so that it is free from standing water."	We support this standard.

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STANDARD	COMMENT
PPS-02.4 (p.64) "Every playground shall be at ground level, unless otherwise approved by the Ministry."	In some areas, rooftop or below ground playgrounds have been permitted and this standard simply states that it shall be at ground level unless otherwise approved by the Ministry.

* * *

STANDARD	COMMENT
PPS-02.5 (p.64) "Every playground shall be laid out so that program staff may maintain constant supervision of the children."	HRS-01.5, previously discussed, sets the standard that the children shall not at any time be left without program staff supervision. It also is common sense that the staff should be able to maintain constant supervision of the children.

* * *

STANDARD	COMMENT
PPS-02.6 (p.64) "The operator shall ensure that the playground is kept clean and in a state of good repair."	We have no problem supporting this standard.

* * *

STANDARD	COMMENT
PPS-02.7 (p.64) "The equipment and furnishings of the playground shall include materials for gross-motor activity in proportion to the number of children enrolled and of a type suitable for the ages of the children enrolled."	O.M.S.S.A. has recommended that many of the equipment items required for proper operation of a day care nursery itemized in the proposed guidelines be changed and introduced as standards. We do not agree with this position at this time as the cost could be exorbitant to private and municipal centres. Accordingly, we would support the standard.

* * *

STANDARD	COMMENT
PPS-03.1 (p.65) "Every day nursery shall provide designated space for activity rooms, play, toileting, washing, eating, dressing, resting, the preparation of food if meals are prepared on the premises, an office, staff rest periods, isolation, storage for food, beds, bedding, toys, indoor and outdoor play material and equipment, cleaning equipment and medical supplies, and, where not shared with other facilities, heating and electrical equipment."	We support O.M.S.S.A. in their position that this discussion paper does not consider the cost implications of these recommendations and how existing centres will be able to accomodate these provisions without reducing existing enrollments. Earlier, the discussion paper stated that group size and classroom size did not have to be linked, and that classrooms could be used as multi-purpose play areas used by more than one group at the same time. The activity room floor space requirements specified in this section would appear to contradict those earlier statements appearing in the section on group size.

PPS-03.2 (p.66)

"The activity room space of a day nursery shall provide a minimum of three square metres of floor space measured wall to wall for each child enrolled."

PPS-03.3 (p.66)

"The wall-to-wall activity room floor space of the day nursery shall be divided into:

a) two separate rooms where more than 10 children under 18 months of age are enrolled, with an additional room being provided for every additional 10 children under 18 months of age enrolled.
b) two separate rooms where more than 12 children under 30 months of age are enrolled, with an additional room being provided for every additional 12 children enrolled.
c) two separate rooms where more than 25 children from 30 months to five years both ages inclusive, are enrolled, with an additional room being provided for every additional 25 children in this age group enrolled.
d) two separate rooms where more than 30 children from six to nine years, both age inclusive, are enrolled with an additional room being provided for every additional 30 children in this age group enrolled.

COMMENTS (Cont'd)

We would support O.M.S.S.A. in their recommendations as follows:

1) That the Ministry prepare for discussion how the interior floor space requirements can be met by existing centres without serious cost implications to municipally run centres and without effecting a reduction in the number of day care spaces.

PPS-03.4 (p.66)

"In addition to activity room space, a day nursery shall provide a sleeping area for every 10 children under the age of 18 months enrolled that is physically separated from the activity room."

PPS-03.5 (p.66)

"The location of all rooms in the day nursery for the use of children under six years of age shall be on or below the second storey."

PPS-03.6 (p.66)

"There shall be protection in a day nursery with respect to exits, stairs, windows, radiators or other heating equipment and other hazards that is acceptable to the local building department and medical officer of health."

PPS-03.7 (p.66)

"Natural lighting shall be provided in the activity room of a day nursery."

PPS-03.8 (p.66)

"Artificial illumination of the activity rooms of a day nursery shall be at the level of 55 dekalux."

PPS-03.9 (p.67)

"A temperature of 20 degrees Celsius shall be maintained in activity rooms of a day nursery between October 1 and May 31."

PPS-03.10 (p.67)

"The activity room of a day nursery shall be ventilated to a level approved by the local medical officer of health."

* * *

STANDARD	COMMENT
PPS-04.1 (p.67) "The equipment and furnishings of a day nursery shall include: a) a quantity of tables and chairs in proportion to the number and size of the children enrolled. b) a quantity of play materials and equipment in proportion to the number of children enrolled and of a type suitable for the ages of the children enrolled. c) cupboard and shelf space to make play equipment accessible to the children."	We are in general agreement and have reviewed the proposals in these standards. Because we do not enroll children in Halton Regional day care centres under the age of 24 months, some of the particulars are not applicable to us. However, on review we feel that the requirements are acceptable and we would recommend their support.
PPS-04.2 (p.67) "All chemicals, disinfectants and other poisonous substances used in a day nursery shall be stored in a locked cabinet or cupboard."	
PPS-04.3 (p.67) "Every day nursery shall have a cupboard or cabinet that can be locked for storage of confidential records."	
PPS-04.4 (p.67) "A washable blanket and sheet shall be provided for every child during the child's sleeping and resting periods."	

PPS-04.5 (p.67)

"Where children under 18 months of age are enrolled, the equipment and furnishings shall also include:

a) a table or counter space adjacent to a sink for dressing and changing diapers, one child at a time, for every ten children enrolled.
b) at least one sink or one flush toilet or hospital sink for every ten children enrolled.
c) a crib for each child enrolled."

PPS-04.6 (p.68)

"Where children from 18 months of age to 30 months of age, both ages inclusive, are enrolled, the equipment and furnishings shall also include:

a) a table or counter space adjacent to a sink for dressing and changing diapers, one child at a time, for each group of 12 children enrolled.
b) at least one sink or one flush toilet or hospital sink for each group of 12 children enrolled.
c) a cot for each child enrolled for a full day session."

PPS-04.7 (p.68)

"Where children from 30 months of age to five years of age, both ages inclusive, are enrolled, the equipment and furnishings shall also include:

a) at least one sink and one flush toilet on the same premises as the activity room space for each group of 15 children enrolled.

(cont'd)

PPS-04.7 (p.68) cont'd

b) a cot for each child enrolled for a full-day session."

PPS-04.8 (p.68)

"Where children from six to nine years of age, both ages inclusive, are enrolled, the equipment and furnishings shall also include:

a) a separate washroom for boys and girls which shall not be public washrooms used simultaneously by the public
b) at least one sink and one flush toilet in each washroom for each 15 children enrolled; a urinal may be substituted in the boys' washroom where more than one such toilet is required."

PPS-04.9 (p.68)

"In full-day programs, a private flush toilet shall be provided for the use of the staff; a separate staff washroom shall be provided where 48 or more children are enrolled in a full-day program."

PPS-04.10 (p.68)

"Except where telephone service is not available in the community

a) each nursery shall have a telephone
b) each building shall have a telephone extension in a nursery accomodated in several buildings."

* * *

STANDARD

PPS-05.1 (p.69)

"The operator shall ensure that:
a) a written procedure specifying the duties of each member of the staff and acceptable to the local fire chief is established and followed in case of fire.
b) the written procedure is posted in a conspicuous place in each room of the day nursery.
c) fire drills are conducted at least once per month.
d) a written record is kept of fire drills and tests of the fire alarm system.
e) a written record is kept of all tests of fire protection equipment carried out by the local fire chief."

COMMENT

We would request some simple clarification of this standard. In items d) and e) of this standard they require a written record be kept. We would recommend that to maintain consistency throughout the document that the written record should be kept in the day nurseries daily log.

We would therefore recommend that these two sections be amended as follows:

STAFF RECOMMENDATION

d) A written record in the daily log be kept of all fire drills and tests of the fire alarm system.

d) A written record in the daily log is kept of all tests of fire protection equipment carried out by the local fire chief.

* * *

STANDARD

PPS-05.2 (p.70)

"The operator shall ensure that a list of emergency addresses and telephone numbers is posted on a card adjacent to the telephone in the day nursery, and this list shall include but not be limited to:

a) the fire department
b) the nearest hospital
c) ambulance service
d) police department

COMMENT

This is a practice generally followed in the majority of centres and certainly in all of our centres.

* * *

STANDARD	COMMENT
PPS-05.3 (p.70) "Emergency contact information, updated every six months, shall be easily accessible at all times that children are in a day nursery, and shall include but not limited to: a) means of transportation to the source of emergency care b) name, address and telephone number of each child's physician c) home and work addresses and telephone number of each child's parent(s) or guardian. d) any special medical information provided by the child's parent(s) or guardian or physician e) any additional information on special needs of the child, as specified by the child's parent(s) or guardian or physician, that might be helpful in handling an emergency situation."	The information contained in these standards are generally what has been followed in our centres and we would have no problem in ensuring this standard.

* * *

ORGANIZATION AND MANAGEMENT

STANDARD	COMMENT
OMS-01.1 (p.73) "Every operator shall have a written statement of purpose and function for each day nursery and private-home day care program that it operates, to include: a) program philosophy b) children to be served; ages, sex, number, handicaps if any c) catchment area served d) services to be provided to meet identified special needs where handicapped children are enrolled."	In PS-01.1 the Province has set a standard that the operator shall have a written statement outlining the program philosophy, method of operation of each of its nursery programs and at this date they should be readily available upon request. This standard specifies that it will state who the children are who may be enrolled in terms of age range, handicaps, if any, and by age and handicap group plus the length of operation of the centres, its philosophy, data program schedules, personal care, etc.

(cont'd)

STANDARD (cont'd)

OMS-01.2 (p.73)

"The statement of purpose shall be reviewed annually by the operator as part of the process of license renewal."

STAFF RECOMMENDATION

That the standard be declared redundant and that any items, such as the annual review, be incorporated in PS-01.1.

* * *

STANDARD

OMS-02.1 (p.74)

"Every operator of a day nursery shall designate an authority within its organization who has responsibility for the management of programs under "The Day Nurseries Act, 1978" and oversees day-to-day operations."

COMMENT

This is currently the method of operation in this department and whether or not this would require a specific by-law would have to be determined from the Regulations when they are produced and published.

* * *

STANDARD

OMS-02.2 (p.74)

"The ultimate control and management authority over a day nursery or a private-home day care agency shall rest with the licensed operator."

COMMENT

The control of management in Halton is by the licensed operator which is the Regional Municipality of Halton. This standard could relate to some specific areas in the privately-owned agencies which require clarification.

* * *

STANDARD

OMS-03.1 (p.75)

"Every operator shall keep financial records in accordance with generally accepted accounting principles for any day nursery or private-home day care agency operated."

* * *

STANDARD

OMS-04.1 (p.75)

"Every operator shall in respect of each day nursery, private home day care service or in-home service provided by the operator, furnish to the Ministry such financial and statistical information as the Ministry may from time to time require."

* * *

STANDARD

OMS-04.2 (p.75)

"Every municipality and band shall, in respect of day nursery services, private-home day care or in-home services that it purchases pursuant to any agreement entered into under The Day Nurseries Act, furnish to the Ministry such financial and statistical information as the Ministry may from time to time require."

COMMENT

This is a standard requirement currently in the Act and one which is followed in this municipality.

* * *

STANDARD

OMS-05.1 (p.76)

"Every private-home day care agency shall keep on its premises a current register of all its supervised day care homes and all information regarding them required by The Day Nurseries Act and the regulations, and it shall provide such information as may from time to time be required by the Ministry."

COMMENT

We have no problem agreeing to these standards although we currently do not have these agencies in Halton.

OMS-05.2 (p.76)

"Every private-home day care agency shall have a written agreement to place each child enrolled in each of its supervised homes, and should keep a current register of all children enrolled and a record of the home in which each child is placed."

STANDARD (Cont'd)

OMS-05.3 (p.76)

"Every private-home day care agency shall complete a written agreement with each of its day care providers specifying the financial and administrative agreements between them."

* * *

STANDARD	COMMENT
OMS-05.4 "Every private-home day care agency shall provide each prospective day care provider with a written copy of all requirements of providers as set out in The Day Nurseries Act and relevant agency policies, and obtain a signed acknowledgement from the provider that such information has been received prior to commencement of an agreement under OMS-05.3."	We do not have P.H.D.C. agencies in Halton at this time but would support the standards.
OMS-05.5 "A municipality that retains an agency to furnish private-home day care shall complete a written agreement specifying the financial and administrative arrangements between them."	

* * *

STANDARD	COMMENT
OMS-06.1 "Every operator of a day nursery or a private-home day care agency shall have a policy of insurance covering the following risks: a) liability to third parties or children in care arising from any accident, mishap or other incident on the operator's premises	We currently do provide insurance coverage to our private-home day care providers. In reviewing this we do recommend that a minimum amount should be inserted into the standard and would recommend that it be amended as follows.

(Cont'd)

STANDARD	STAFF RECOMMENDATION
OMS-06.1 (cont'd) b) liability to third parties or children in care arising through the use of any vehicle, whether owned or not owned by the operator, used by any of the operator's staff or agents on the operator's business.	Every operator of a day nursery or a private-home day care agency shall have a policy of insurance in a minimum amount of _____ covering the following risks:
OMS-06.2 "Every private-home day care agency shall ensure that each caregiver in its supervised homes has a policy of insurance covering liability to third parties on children in care arising from any accident, mishap or other incident on the provider's premises."	

* * *

STANDARD	COMMENT
DCS-01.1 "Every private-home day care agency shall have a written statement outlining the program philosophy and method of operation of each of its private-home day care programs, and this statement shall be readily available upon request. This statement may specify: a) the children who may be enrolled in terms of age range, handicaps, if any, and their degree, and the number by age and handicap b) the length of operating day, week and year c) the particular approach to programming that is followed, including: (Cont'd)	This standard has already been agreed to in PS-01.1 and in OMS-01.1 and is repeated again here specifically for the private-home day care programs. STAFF RECOMMENDATIONS That the matter has already been covered and that the standard in OMS-01.1 and PS-01.1 be expanded to include this program.

STANDARD

DCS-01.1 (cont'd)

i) philosophy
ii) preferred daily activities
iii) personal care
iv) parental involvement
v) behaviour and guidance
vi) specialized services"

* * *

STANDARD

DCS-02.1

"Every private-home day care agency shall have a written statement of preferred daily activities and the statement shall be made available to each of its providers."

DCS-02.2 STANDARD

"The statement of preferred daily activities shall include, but not be limited to, the following:

a) group and individual activities
b) activities designed to promote gross and fine-motor, cognitive, social and emotional development activities
c) active and quiet play
d) outdoor play, especially for children more than two years of age in attendance for a full day, and the conditions under which such play shall not occur."

* * *

COMMENT

We would prefer to see the preferred daily activities statement made available not only to the provider but also to the parent. In addition, in DCS-02.2 item (d), we have some concern as to the open-endedness of the words "and the conditions under such play shall not occur." We presume this to mean weather conditions, areas away from the provider's home such as near water, etc. But we do feel that there should be some clarification and expansion on this by the Province. Apart from this clarification and expansion we are prepared to support the recommended standard.

STANDARD

DC-03.1

"Every private-home day care agency shall have a written statement of policies and practices with respect to parental involvement in its child care services and its training/educational activities."

COMMENT

We agree with O.M.S.S.A. that not only should we have policy with respect to parental involvement in the child care services but also a statement of parental responsibilities and we would agree with their recommended format as follows.

OMSSA RECOMMENDATION

Every private-home day care agency shall have a written statement of policies and practices with respect to parental involvement and responsibilities in its child care services and the training/educational activities.

* * *

STANDARD

DCS-04.1

"Every private-home day care agency shall have a written statement of sanitary procedures for personal care, with particular references to children under the age of two."

COMMENT

We are curious as to how detailed this procedure should be and according to whose standards. We would therefore recommend that the standard be amended to read as follows.

STAFF RECOMMENDATION

That DCS-04.1 be amended to read:

> Every private-home day care agency shall have a written statement of sanitary procedures for personal care as approved by the local medical officer of health, with particular reference to children under the age of two.

* * *

STANDARD

DCS-05.1

"When care is provided for a full day, the agency shall ensure that the daily activities include provision for each child under the age of 18 months in attendance for a full day session to sleep or play outdoors for at least two hours when the weather is suitable unless a physician advises otherwise."

COMMENT

The standard is too restrictive and should only read as follows:

STAFF RECOMMENDATION

That the standard be amended to stop after the phrase "when the weather is suitable" and delete "unless a physician advises otherwise."

* * *

STANDARD

DCS-05.2

"When care is provided for a full day, the agency shall ensure that the daily activities include provision for each child between the ages of 18 months and 30 months in attendance for a full day session to have a rest period of one hour."

COMMENT

Again, as in PS-04.2, we do not feel that a rest period of only one hour is sufficient for a child under 30 months of age. We would therefore recommend that the standard be re-written.

STAFF RECOMMENDATION

When care is provided for a full day, the agency shall ensure that the daily activities include provision for each child between 18 months and 30 months in attendance to have a rest period of not less than one hour and not more than two.

* * *

STANDARD

DCS-05.3

"When care is provided for a full day, the agency shall ensure that the daily activities shall include provision for each child between the ages of 30 months and five years of age, both ages inclusive, in attendance for a

(cont'd)

COMMENT

Again, as in previous proposals, we feel that the 30 minutes to one hour is not sufficient time and does not provide for enough flexibility. We recommend that the standard be amended as follows.

STANDARD

DCS-05.3 (cont'd)

full day session to have a rest period of thirty minutes to one hour."

STAFF RECOMMENDATION

When care is provided for a full day, the agency shall ensure that the daily activities shall include provision for each child between the ages of 30 months and five years of age, both ages inclusive, in attendance for a full day session to have a rest period of not less than 30 minutes and not more than two hours.

* * *

STANDARD

DCS-06.1

"Before placement in a supervised home, the agency shall ensure that each child shall be given immunization as required by the local medical officer of health; the child shall be immunized thereafter as required by the local medical officer of health. A record shall be maintained by the agency of all immunizations of every child enrolled."

COMMENT

A record of immunization should be on the child's annual medical statement. The agency's prime concern should be that the annual medical is completed and the child is free of communicable diseases. We therefore recommend that the standard be amended as follows.

STAFF RECOMMENDATION

Before placement in a supervised home, the agency shall ensure that each child be given immunization as required by the local medical officer of health; that the child be immunized thereafter as required by the local medical officer of health. An updated annual medical shall be maintained by the agency.

* * *

DCS-06.2 STANDARD

"The agency shall require that each provider make a daily inspection of every child in the private-home day care home before the child begins to associate with other children to detect symptoms of ill health, communicable disease and child abuse."

COMMENT

We support this standard but mention as we did previously the word "inspection" may be softened to "observation", but generally we agree with the standard.

* * *

STANDARD	COMMENT
DCS-06.3 "The agency shall ensure that each provider is aware of the child abuse reporting requirements as set out by The Child Welfare Act, 1978 and that the agency is informed of any suspected instance of abuse thereof."	This is a legal requirement under The Child Welfare Act.

* * *

STANDARD	COMMENT
DCS-06.4 "The agency shall ensure that any child in private-home day care who develops symptoms of serious illness shall be encouraged to remain in a quiet, but not completely isolated, area designated for rest and care until the child can be examined by a licensed physician or a nurse registered under The Nurses Act or until the parent or guardian can take the child home."	This standard refers to a serious illness and requires that the child be isolated and maintained in the private-home day care setting. There is a possibility that the examination by a licensed physician or nurse may require additional costs which would have to be assumed by the agency or municipality. The standard does not seem to allow for the child to be removed from the home to a health-care facility or hospital. STAFF RECOMMENDATION That the Province review this standard to remove the restrictiveness of requiring the child to remain in the private-home day care facility.

* * *

STANDARD	COMMENT
DCS-06.5 "Where a serious accident, illness or death occurs to a child in a private-home day care home, the agency shall ensure that the provider promptly: (cont'd)	There will be additional reporting requirements on the agency under PS-06.5 to report these items to the Ministry and our comments in that area should be read in conjunction with this standard.

STANDARD (cont'd)	STAFF RECOMMENDATIONS
DCS-06.5 cont'd a) obtain all necessary emergency medical assistance b) notify the parent or guardian of the child c) notify the agency	Supported but with our remarks under PS-06.5 to be taken into account.

* * *

STANDARD	COMMENT
DCS-06.6 "The agency shall ensure that every private-home day care provider keep available for emergency treatment on the premises a first-aid kit."	We agree with these standards.

STANDARD	
DCS-06.7 "The agency shall require that in each supervised home: a) Only those drugs and medications recommended in writing by a licensed physician shall be clearly labelled with the child's name and instructions for the administration of the drug or medication."	

* * *

STANDARD	COMMENT
DCS-06.8 "Where there are animals in a private home where private-home day care is provided, the agency shall ensure that the animals are properly protected against rabies."	As in previous comments, we feel that the protection of the child should extend beyond just rabies and that the animals should be examined annually for any communicable diseases.

* * *

STANDARD	COMMENT
DCS-07.1 "The private-home day care agency shall ensure that each provider in consultation with the child's parents and the private-home day care visitor plans menus and feeding arrangements that conform to the provisions of Canada's Food Guide."	We support these standards and recommend their approval.
DCG-07.2 STANDARD "The private-home day care agency shall ensure that each caregiver shall provide: a) feedings to each infant under one year of age in accordance with written instructions from the parents or guardian regarding type and scheduling; where formula is brought by parents it shall be stored in the refrigerator until feeding time; where more than one infant is cared for, the formula shall be individually labelled. b) meals for each child more than one year of age who attends the program for more than four hours a day c) between-meal snacks for all children more than one year of age according to Canada's Food Guide d) special diets or feeding arrangements in accordance with written instructions from the parents or guardian supported by medical advice."	

* * *

STANDARD

DCS-08.1

"Every private-home day care agency shall have a written policy with respect to behaviour management practices permitted or prohibited for its care providers."

DCS-08.2

"The following forms of discipline shall not be used:

a) corporal punishment, including but not limited to the following:
   i) striking a child, directly or with any physical object
   ii) shaking, shoving, spanking or other forms of aggressive contact
   iii) requiring or forcing the child to repeat physical movements
   iv) physical restraints as a form of punishment

b) harsh, humiliating, belittling or degrading responses of any form, including verbal, emotional and physical.

COMMENT

We agree with DCS-08.1, but in DCS-08.2 we feel that as in PS-07.2 it should be amended to prohibit prolonged use of isolation, use of darkness, forcing or with-holding of food as a means of punishment. We would therefore recommend that it be amended as follows:

STAFF RECOMMENDATION

That DCS-08.2 be amended by adding to item a) a number v) "prolonged use of isolation, use of darkness or the forcing or witholding of food."

* * *

STANDARD

DCS-08.3

"Every private-home day care agency shall have a written procedure for the monitoring of the behaviour management practices of its providers, and a record of this monitoring shall be made quarterly."

COMMENT

If the Province is suggesting, as they do in the last comment, that the monitoring record be made quarterly, the implication is that the visit by the home visitor would be made every three months. This would be totally insufficient to adequately monitor behaviour management practises to either make this standard enforceable or to have any merit. We agree with O.M.S.S.A. that the standard should be reintroduced as a guideline and also that parents

(cont'd)

DCS-08.3 (cont'd)

COMMENT (cont'd)

should be encouraged to discuss behavioural management practices with care providers and to register any complaints it concerns directly with the private-home day care agency.

* * *

STANDARD

DCS-09.1

"The operator of a private-home day care agency shall keep in the office of the private-home day care agency and make available to the respective provider, records maintained up to date and available for inspection at all times that shall include in respect of every child enrolled:

a) an application for enrolment signed by the parent or guardian of the child
b) the name, date of birth and current home address of the child
c) the names and current home addresses of the parents or guardian of the child
d) the current place at which a parent or guardian can be reached in case of an emergency during the hours when the child is in the care of the private-home day care provider
e) the name and address of the family physician of the child
f) the date of the admission of the child
g) the date of discharge of the child
h) a record of the daily attendance of the child
i) a record of the child's communicable diseases and immunization

cont'd

COMMENT

These practices and this standard are generally maintained with only minor variation at the present time and we would have no hesitation of supporting this standard.

STANDARD (cont'd)

DCS-09.1 (cont'd)

j) with respect to medications, a recommendation in writing signed by a licensed physician for any medical treatment or medication for the child which is to be administered during the hours the child is in the supervised private-home day care home.

k) with respect to any special requirements for diet, rest or exercise, a recommendation in writing signed by a licensed physician."

* * *

STANDARD

DCS-09.2

"Every private-home day care agency shall maintain records of visits of inspection made to its premises and any of its providers by:

a) the local medical officer of health or any other person designated by him or her
b) the local fire department
c) any person designated as a program adviser under subsection 1 of section 16 of the Day Nurseries Act, 1978

COMMENT

We have no problem supporting this standard as it is already in place in Halton.

* * *

STANDARD

DCS-10.1

"The private-home day care agency shall keep personal records of the children confidential and in a locked file."

DCS-10.2

"No private-home day care agency shall make public, either in writing or verbally, the (cont'd)

COMMENT

We can agree with DCS-10.1. However, in DCS-10.2 this is an extremely restrictive standard of confidentiality. We are curious as to what they mean by "make public"? Is the Province intending that we do not communicate with other agencies or that we cannot communicate without the consent of the client. We feel that this standard should be amended as follows.

STANDARD (cont'd)	STAFF RECOMMENDATION
DCS-10.2 cont'd identity of any person who is eligible for or receives a subsidy."	No private-home day care agency shall make public, either in writing or verbally, without the consent of the person, the identity of any person who is eligible for or receives a subsidy. In addition to the above, the Province may want to take into consideration the fact that not only is the personal records of the child in DCS-10.1 to be kept confidential, but because of the nature of this particular program personal and financial records of the family are maintained. The Province may wish to enact a different standard stating that the private-home day care agencies shall keep personal and financial records of the family of a child confidential and in a locked file.
* *	*
STANDARD	COMMENT
DCS-11.1 "Within six months of the commencement of employment, each home visitor shall have his or her performance evaluated for the purpose of developing a training plan. He or she shall participate in the development of the training plan which shall include but not be limited to: a) a list of the minimum competencies required b) a list of any additional competencies desired c) a list of training activities planned.	This is the policy of the Region and we endorse the standard.
DCS-11.2 "The training plan shall be recorded and kept in the employee's personnel file. cont'd	

STANDARD (cont'd)

DCS-11.3

"Training plans shall be reviewed annually and the review process described and recorded.

* * *

STANDARD

DCS-11.4

"Every private-home day care agency shall have an annual plan and written policies and practices with respect to the training, development and support of its providers, and a written form of this material shall be made available to each provider at the commencement of an agreement and subsequently on an annual basis."

COMMENT

I can see no problem with the development of this type of plan, but I certainly do not see why it is necessary that it be provided on an annual basis. Surely, it could be provided on the renewal of an agreement or at any time when the plan and written policies and practices are amended or changed. We would therefore recommend that the standard be amended as follows.

STAFF RECOMMENDATION

Every private-home day care agency shall have an annual plan and written policies and practices with respect to the training, development and support of its providers, and a written form of this material shall be made available to each provider at the commencement of or the renewal of an agreement, and subsequently at any time in which changes or amendments are made to the policies, practises, training, development or support of the provider.

* * *

STANDARD

DCS-11.5

"The annual plan for caregiver training activities shall include but not be limited to opportunities for the learning of specific competencies in the areas of:

cont'd

COMMENT

We presently provide training activities as listed and would endorse the standard.

STANDARD (cont'd)

DCS-11.5 (cont'd)

a) nutrition
b) health
c) safety and sanitary practices
d) arrangement and use of space
e) child development
f) methods of guidance and stimulating activities for children."

* * *

STANDARD	COMMENT
DCS-12.1 "Every private-home day care agency shall employ for the purpose of support and supervision of its providers, private-home day care visitors who have: a) completed a program in early childhood eduaction or who have equivalent competencies, and b) at least two years' experience in a day nursery(ies) appropriate to the age and developmental level of the children enrolled."	See O.M.S.S.A. recommendation as follows: O.M.S.S.A. RECOMMENDATION DCS-12.1 will be withdrawn and replaced by the following: Every private-home day care agency shall employ for the purpose of support and supervision of its providers, private-home day care visitors who have: a) completed an accredited program in early childhood education or who have equivalent competencies in related disciplines, and b) at least two years' related work experience appropriate to the age and developmental level of the children to be enrolled."

* * *

STANDARD

DCS-12.2

"Every private-home day care agency shall have written policies, and criteria with respect to the recruitment, selection and retention of its supervised care providers."

COMMENT

We would agree with this standard.

* * *

STANDARD

DCS-13.1

"Each person caring for children on the premises in which private-home day care is furnished and every other person ordinarily resident or regularly on the premises shall be examined by a licensed physician and shall obtain from the physician a certificate that he or she is free from communicable diseases, has had immunization deemed adequate by the local medical officer of health including immunization for rubella, and has had a test for tuberculosis that shows negative results. This certificate shall be received by the private-home day care agency before placement of a child occurs and at least every two years thereafter."

COMMENT

Because providers are in daily contact with the children, it is felt that the present standard of an annual medical should not be lowered. It is felt, however, that the Ministry must consider the impact on present programs of having "every person resident or regularly on the premises" to be required to have a medical. If this is to become an accepted standard, how will this be implemented? It is felt that that part of the standard would be more appropriate as a guideline. We would support the fact that every person ordinarily resident on the premises should be examined, but certainly to try to enforce everybody who is regularly on the premises would be almost impossible. We therefore recommend that this be amended as follows.

STAFF RECOMMENDATION

DCS-13.1 be amended to read:

Each person caring for children on the premises in which private-home day care is furnished and every person ordinarily resident on the premises shall be examined by a licensed physician and shall obtain from the physician a certificate that he or she is free from communicable diseases, has had immunization deemed adequate by the local officer of health,

cont'd

DCS-13.1 cont'd

STAFF RECOMMENDATION (cont'd)

and has a test for tuberculosis that shows negative results. This certificate shall be received by the private-home day care agency before placement of the child occurs and at least every year thereafter.

* * *

STANDARD	COMMENT
DCS-14.1 "The number of private-home day care visitors required by a private-home day care agency to supervise its day care homes shall not exceed the ratio of one private-home day care visitor for every 25 homes."	We support this standard which is the ratio used in Halton.

* * *

STANDARD	COMMENT
DCS-14.2 (p.96) "The private-home day care agency shall ensure that the number of children placed in the charge of any day care provider including the children of the provider under the age of six does not exceed 5 children, and further that a private-home day care provider cares for no more than: a) two handicapped children b) two children who are two years of age or younger c) three children, who are three years of age or younger."	This is our current practice in Halton and we are in support of this standard.

* * *

DCS-14.3 (p.96) STANDARD

"Within the limits set out in DCS-14.2, every private-home day care agency shall establish a maximum capacity for each home in which care is to be provided, and this capacity shall be stated in the agreement with the provider."

COMMENT

We support this standard.

* * *

DCS-14.4 (p.96) STANDARD

"Children in attendance for private-home day care shall not at any time be left without adult supervision."

COMMENT

This standard is self-evident and supported.

* * *

DCS-15.1 (p.97) STANDARD

"Every private-home day care agency shall have written home selection policies, practises, and procedures to ensure that any building in which private home day care is furnished is constructed and maintained so that it complies with:

a) the laws affecting the health of inhabitants of the municipality or the reserve of the band, as the case may be, in which the building is located.
b) any rule, regulation, direction or order of the local board of health and direction or order of the local medical officer of health.
c) any by-law of the municipality in which the building is located or any by-law of the council of the band on the reserve in which the building is

cont'd

COMMENT

We have no problem in supporting these three standards.

STANDARD (cont'd)

DCS-15.1 cont'd

located, as the case may be, and any other law for the protection of persons from fire hazards.

d) any restricted area, standard of housing or building by-law passed by the municipality in which the building is located pursuant to Part III of The Planning Act or any predecessor thereof, and, where the building is located on the reserve of a band, any by-law of the council of the band on the reserve to regulate the construction, repair or use of buildings."

DCS-15.2 (p.98)

"The written procedures as outlined in DC-16.1 shall be approved by the appropriate local authorities."

DCS-15.3 (p.98)

"The premises where private-home day care is to be furnished or is being furnished shall be inspected by a private-home day care visitor on behalf of the agency or Minister as the case may be, before the home is approved and at least every three months thereafter or such more frequent intervals are deemed necessary by the private-home day care agency or Minister, and the private-home day care visitor shall ensure that there is compliance with the requirements prescribed in the regulations for the health, safety and well-being of the children receiving private-home day care. A record of all such visits shall be maintained by the private-home day care agency."

* * *

DCS-16.1 (p.98) STANDARD

"No child in private-home day care shall play on a balcony without an adult being present, and no child 5 years of age or less shall play outdoors without adult supervision."

DCS-16.2 (p.98)

"Where there are balconies, they shall be inspected by the private-home day care visitors and the Fire and Health inspectors to ensure the safety of the children."

COMMENT

We support these standards.

* * *

DCS-17.1 (p.99) STANDARD

"The premises where private-home day care is provided shall have separate areas for play, eating and resting."

COMMENT

This is rather a restricted standard and in many homes is not unusual for bedrooms to be used for both resting and play areas or for kitchens to be used for both eating and play areas. We would therefore support O.M.S.S.A. in its amendment to this standard.

O.M.S.S.A. RECOMMENDATION

This standard be amended to read:

"The premises where private-home day care is provided shall have areas for play, eating and resting."

* * *

DCS-17.2 (p.99) STANDARD

"Access to the premises where private-home day care is to be furnished or is being furnished shall be permitted from time to time and at all reasonable times for any

cont'd

COMMENT

In both of these standards, we fully support them.

STANDARD (cont'd)

DCS-17.2 cont'd

person making an inspection pursuant to the foregoing clause and for any person designated as a program advisor under subsection 1 or subsection 16 or The Day Nurseries Act, 1978."

DCS-17.3 (p.100)

"A temperature between 19 degrees C and 20 degrees C shall be maintained between October 1 and May 31 in the premises where private-home day care is furnished."

* * *

STANDARD	COMMENT
DCS-17.4 (p.100) "A basement that is to be used as a play area for part of the time that a child is receiving private-home day care shall be approved as a safe and healthy place to play by the private-home day care visitor."	In Halton "shall be approved" means the Fire and/or Health inspector.

* * *

STANDARD	COMMENT
DCS-18.1 (p.100) "Every private-home day care agency shall have written policies, practices and procedures with respect to the provision of equipment in its supervised day care homes, and the respective responsibilities of the agency and the provider shall be contained in the written agreement between them."	OMS-05.3 states that the agency shall have a written agreement with each of its providers specifying the financial and administrative arragements between them. This particular standard seems to be an extension to that end and could probably be combined with OMS-05.3 to provide a reduction in the number of standards and more consistency in the agreement phase. cont'd

DCS-18.1 (cont'd)

* * *

STANDARD

DCS-18.2 (p.101)

"Every private-home day care agency shall ensure that the equipment and furnishings in a home where private-home day care is provided shall include:

a) a quantity of indoor and outdoor play material and equipment in proportion to the number of children enrolled and a type suitable for the ages of the children enrolled.
b) a crib, with sides or a playpen for each child under the age of 18 months enrolled.
c) a cot or bed of a family member for each child over the age of 18 months enrolled.
d) washable blanket and sheet for each child enrolled.

DCS-18.3 (p.100)

"The agency shall ensure that all chemicals, disinfectants and other poisonous or hazardous substances used in a home where private-home day care is provided shall be stored in a locked cabinet or cupboard."

DCS-18.4 (p.101)

"In the selection of homes, the agency shall ensure that every private-home day care home have a telephone except where telephone service is not available in the community."

* * *

STAFF RECOMMENDATION

DCS-18.1 be included in OMS-05.3.

*

COMMENT

The three standards are currently being met by this Department.

STANDARD	COMMENT
DCS-19.1 (p.101) "In co-operation with the local fire authorities, the private home day care agency shall develop a written fire evacuation plan to be carried out in its homes and before placement of a child, a home-specific procedure including the duties of the caregiver shall be established for each home by the home visitor and the provider." DCS-19.2 (p.101) "In every private home day care, telephone numbers of the fire department, nearest hospital, ambulance, poison control centre and police department, shall be attached to or immediately adjacent to each telephone." DCS-19.3 (p.102) "Emergency contact information, updated every six months, shall be easily accessible at all times that children are in a home where private-home day care is being provided and shall include: a) means of transportation to the source of emergency care b) name, address, and telephone number of each child's physician c) home and work addresses and telephone numbers of each child's parent(s) d) any special medical information provided by the child's parent(s) or physician e) any additional information or special needs of the child, as specified by the child's parent(s) or physician, that might be helpful in handling an emergency situation.	We intend to approach the local fire authorities in helping to develop the written fire evacuation plans and the duties of the caregiver, etc. in the home-specific procedures. While we do have co-operation now and do require an inspection by the local fire authorities, this will be an expansion on our procedures and one which we think will greatly help in providing fire safety and emergency information.

* * *

DAY NURSERIES FOR CHILDREN WITH SPECIAL NEEDS

Commencing on Page 103 of the Provincial Discussion Paper is a special section on services for children with special needs. On the last paragraph on page 103 it is stated "standards proposed in this section set out requirements in addition to those prescribed for the operation of a licensed day nurseries program. Programs offering services to children with developmental or physical handicaps would need to meet both sets of licensing standards. These standards have been developed from Ministry publication Draft Policy Manual for Children With Special Needs, which has been previously distributed and they are being included to provide broader circulation and consultation.

The goal of programs for children with developmental or physical handicaps is to raise the functioning level of each child in all areas of development, including social skills, to the optimum, enabling the child to be admitted to regular school, where possible. The pre school intervention programs seek to enable children with special needs to function within a group of normal children with the same chronological age. Integrated programs will be of assistance not only to the child with special needs but to the parents of these children and will also be a valuable experience for other children enrolled in the day nurseries program.

At the present time all of our day care centres provide integrated programs. Providing this level of care to developmentally handicapped children requires a higher ratio of staff to children than is normally the case. At the present we have one resource teacher with special qualifications for every four developmentally or physically handicapped pre school children so that the individual program and training plans can be developed. When children who are developmentally handicapped or have special needs are placed in private home day care, then the agency will be required to provide one resource teacher as a home visitor for every four handicapped children so placed.

It should be pointed out that for this particular service, the Province pays a higher subsidy. Our subsidy on the regular program is 80/20 while we receive an 87/13 percent subsidy for the programs for children with special needs.

The area of services for children with need raises several other interesting points and these will be expanded upon as the standard is presented.

STANDARD

SNS-01.1 (p.105)

"A written individual program plan and a written individual training plan with provision for monthly updating shall be developed for each handicapped child enrolled in:

a) a group program in a nursery for the developmentally or physically handicapped, a developmental centre or an integrated centre
b) a complementary in-home program or alternative in-home program operated by a day nursery."
c) a private-home day care program where this is the only developmental program that the child attends during the day."

COMMENT

It is necessary in reviewing these individual program plans to refer back to the glossary of the report. In the glossary (p.15) individual training plan is defined as "a written individual training and treatment plan, based on a team assessment of specific behaviour and skills, stating the objectives for a handicapped child in sequential, time measurable goals, and reviewed and revised at least once a month.

The definition of the individual training plan includes the phrase "based on a team assessment". Further in the glossary team assessment is assessed as being - "a team assessment of a child's physical, mental, social and emotional growth performed by a team of specialists including at least three of the following:

- pediatrician
- public health nurse
- psychiatrist
- registered psychologist
- speech therapist
- occupational therapist
- early childhood education consultant
- educational consultant
- psychometrist
- physiotherapist
- kinesiologist, or
- audiologist

It is noted that the Province of Ontario has this list under review and it is subject to change.

cont'd

SNS-01.1 cont'd

COMMENTS (cont'd)

Further in the glossary there is a reference to "individual program planning" which is defined as - "a time framed plan of intervention based on a variety of observation, assessment and reports on the child, pinpointing areas in which future growth would occur (long term goals) and facilitating the implementation of a current individual training/treatment plan, preferably written by a team of people who have worked with the child, involving the child's parents to be reviewed and revised every six months to one year.

We can certainly agree with the position put forward that special needs of children training and program plans should be developed. However, the list of professionals listed under the team assessment raises the spectre of costs and available services within Halton. At present children must travel to Toronto or Hamilton to receive a team assessment.

Staff recommend that this standard be referred back to the Ministry.

* * *

STANDARD

SNS-01.2 (p.106)

"The goals of the individual program plan for a developmentally handicapped child aged six or older shall include development of the child's behaviours to the level acceptable for admittance to the local school."

cont'd

COMMENT

These are self-explanatory and subject to the comments which we would receive on SNS-01.1 we would be prepared to support them.

STANDARD (cont'd)

SNS-01.3 (p.106)

"Copies of the child's individual program and training plans shall be kept in the child's program record together with subsequent revisions of the plans."

* * *

STANDARD

SNS-02.1 (p.106)

"The daily schedule in an integrated day nursery, a nursery for the developmentally or physically handicapped or developmental centre shall ensure that:

a) each handicapped child has teaching according to an individual training plan prescribed for that child; five days per week, for a minimum of two hours per day, of individual teaching in the case of a half-day program and four hours per day of individual teaching in the case of a full-day program; deviations from the written plan shall be documented in the child's program record.
b) the requirements in PS-02.2, PS-02.3, PS-02.4 of a day nursery are fulfilled. (These standards refer to playgrounds)
c) activities appropriate to the developmental levels of all children are included.

COMMENT

The proposed standard implies that a special needs child must have a minimum of two hours individual teaching per day. We feel that this is not appropriate nor is it in the best interest of the overall development of the child. The standard suggests that the child must attend a minimum number of hours in order for the child to benefit from the program. We feel that in any attendance in a program, individual teaching will take place as recommended in the individual's training plan and we are also somewhat concerned with the heavy emphasis on the words "individual teaching".
We would then recommend that section a) of SNS-02.1 be amended as follows.

STAFF RECOMMENDATION

a) each special needs child shall attend the nursery for a minimum two hours per day for a half-day program; four hours per day for a full day program. Each special needs child must have teaching according to an individual training plan, prescribed for that child, to be implemented in the child's program. Deviations from the written plan shall be documented in the child's program record.

* * *

STANDARD

SNS-02.2 (p.106)

"Where a handicapped child is placed in private home day care, the private home day care agency shall ensure that:

a) the child has teaching according to an individual training program prescribed for that child, deviations from the written plan shall be documented in the child's program record.
b) the requirements of DCS-02.1 and DCS-02.2 of a private home day care agency program are fulfilled. (DCS-02.1 refers to a program statement and DCS-02.2 refers to preferred daily activities.)
c) activities appropriate to the developmental levels of all children enrolled are undertaken.

COMMENT

Subject to an interpretation on our individual training plan as previously mentioned we are supportive of this standard.

* * *

STANDARD

SNS-02.3 (p.107)

"If a handicapped child enrolled in a day nurseries program or placed in private home day care is absent due to illness the program staff responsible for the child's individual training program shall maintain personal contact with the child's parent or designated substitute at least once a week, and keep a log of the date and nature of each contact."

COMMENT

We question the use of the word "personal contact" as this would imply a face to face meeting. We also question why contact must be on a weekly basis when, for instance, it would become known that the child was hospitalized and that the hospitalization would require longer than one week or where the illness was fully documented on the first contact and the return to the program was anticipated in two to three weeks. We would suggest in this type of instance it would only be necessary to do a follow up when the prescribed time of absence had expired.
We feel this standard should be amended.

cont'd

SNS-02.3 (p.107) cont'd

STAFF RECOMMENDATION

If a special needs child enrolled in a day nurseries program or placed in a private home day care is absent due to illness, without documented medical evidence, the program staff responsible for the child's individual training plan shall maintain contact with the child's parents or designated substitute at least once a week, and keep a log of the date and nature of each contact.

* * *

STANDARD

SNS-03.1 (p.107)

"The operator of a day nursery shall keep on the premises of a day nursery and the operator of a private home day care agency shall keep on the premises of the agency records maintained up to date and available for inspection at all times that shall include in respect of every handicapped child enrolled, in addition to the contents specified in PS-08.1, DCS-09.1 and SN-01.3;

a) a letter of referral and within four months of admission a summary of a team assessment
b) signed permission forms for participation in specialized services, where required
c) a record of all home visits, where applicable
d) copies of all rejected applications for regular school enrollment, where applicable, and a record for the reasons for each referral."

COMMENT

In the operative statement above, PS-08.1 refers to family detail, DCS-09.1 refers to family detail for persons enrolled in private home day care and SN-01.3 refers to the individual program. Subject only to our previous comments regarding the summary of a team assessment within four months of admission, we would be supportive of this statement.

* * *

STANDARD

SNS-04.1 (p.108)

"The operator of a day nursery or a private-home day care agency shall not require an initial consent from a handicapped child's parent(s) or guardian to release of personal information concerning the child or the child's parent(s) or guardian as a condition for enrollment."

COMMENT

In some instances it has been found that agencies require a blanket consent form at the time of enrollment of a child. We do not support this position and do support the standard.

* * *

STANDARD

SNS-04.2

"The operator of a day nursery or a private-home day care agency shall ensure that no records or personal information of any kind, verbal or written, of any handicapped child enrolled or the child's parent(s) or guardian, is disclosed to any person other than program staff unless a signed, current consent to release of information is obtained from the child's parent(s) or guardian."

COMMENT

This is currently the practice in most day care centres. However, it is not unusual for children referred to the centre to have discussion take place between our staff and the referring agency. This particular standard, while we support it, will create an additional administrative problem in the obtaining of releases when discussions take place with bonafide social agencies. The Province may wish to review this matter and set up guidelines to go with this particular standard.

STAFF RECOMMENDATION

Supported with consideration of supportive guidelines being established.

* * *

STANDARD	COMMENT
SNS-05.1 "The operator of an integrated centre, a nursery for the developmentally or physically handicapped or a developmental centre shall employ for the care and guidance of each group of handicapped children, as defined in Schedule 1 (b) (see page 43), at least two program staff who have completed a program in early childhood education or have equivalent competencies, and whose training is appropriate to the age and developmental level of the children enrolled."	Schedule 1 (b) refers to program staff/child ratios, as set out on page 43 of the Province's proposals. We have already commented with respect to the staff/child ratios.

* * *

STANDARD	COMMENT
SNS-05.3 "The operator of a private-home day care agency providing an in-home service shall employ for the guidance of every four children placed in its homes, as a home visitor, a resource teacher who has completed a program in early childhood education or has equivalent competencies, has a minimum of one year of special training in teaching handicapped children, and, if working with multi-handicapped children has a current Red Cross of St. John Ambulance certificate in first aid."	We agree with this standard, although due to restrictions of the Day Nurseries Act, we do not presently serve handicapped children in P.H.D.C.

* * *

STANDARD	COMMENT
SNS-05.4 "An in-home service provided by a day nursery or a private-home day care agency shall be carried out by a resource teacher with special training in teaching handicapped children."	We support this standard.

* * *

STANDARD	COMMENT
SNS-05.5 "The operator of a nursery for the developmentally or physically handicapped or a developmental centre shall employ a director/supervisor who has completed a program in early childhood education or has equivalent competencies, has a minimum of one year of special training in teaching handicapped children, has a minimum of two year's experience in a supervisory position in a program for either normal or handicapped children."	We support this recommendation.

* * *

STANDARD	COMMENT
SNS-05.6 "The operator of a day nursery shall ensure that persons who work with handicapped children and lack full qualifications of program staff as defined in SNS-05.1, experience a minimum of three months' probation and training in the program before appointment to the staff, have demonstrated sufficient understanding of handicapped children to write, implement and chart individual training plans on the specific children assigned to them under supervision, and have made a committment to work towards an early childhood education deimploma or equivalent in the immediate future.	We support this recommendation.

* * *

STANDARD	COMMENT
SNS-06.1 (p.110) "The location of all rooms in a day nursery for the use of handicapped children shall be on or below the second storey."	We would currently appear not to have any problems in meeting the requirements stated in SNS-06.1 - SNS.06-5. However, as previously has been stated in this report, the Province will have to take a look at what effect this will have on smaller schools and whether or not this will indeed cause additional costs or a reduction in the enrollment of children and, therefore, a loss of space. Subject to satisfactory answers in these areas, we would cont'd
STANDARD SNS-06.2 (p.110) "A nursery for the developmentally handicapped shall physically separate children under ten years of age from those ten to eighteen years of age."	
STANDARD SNS-06.3 (p.111) "A wall-to-wall activity room floor space of a day nursery for the physically or developmentally handicapped, shall be divided into two separate rooms where more than 12 children are enrolled, with an additional room being provided for every additional 12 children."	

STANDARD

SNS-06.4 (p.111)

"The activity room space of a day nursery for the handicapped shall be provided as follows:

a) in the case of a nursery for physically or developmentally handicapped children under six years of age, a minimum of five square metres of floor space measured wall-to-wall for every child enrolled.
b) in the case of a developmental centre, a minimum of seven square metres of floor space measured wall-to-wall for each child enrolled."

COMMENT (Cont'd)

be willing to support these standards.

STANDARD

SNS-06.5 (p.111)

"A room or area of an integrated centre shall be designed as a resource area for the use of the resource teacher and other program staff for individual and small group training and writing and/or charting of individual training plans."

* * *

STANDARD

SNS-07.1 (p.111)

"The equipment and furnishings of an integrated centre shall be at the same standard as in a day nursery for normal children of the same age group."

COMMENT

We agree and support this standard.

* * *

STANDARD	COMMENT
SNS-07.2 (p.111) "The equipment and furnishings of a nursery for the developmentally or physically handicapped or a developmental centre shall be of the same standard as in a day nursery for normal children except that these shall include: a) a table or counter space for changing or dressing, one child at a time, for every 12 children who might be in need of these hygeinic services. b) at least two wash basins and two flush toilets for each additional group of 12 children enrolled. c) at least two wash basins and two flush toilets for each additional group of 12 children enrolled. d) a resting pad for each child enrolled for a full-day session. e) a washroom of sufficient size to accomodate children in wheelchairs, if required.	We agree and support this standard.

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SECTION II

PROPOSED GUIDELINES
DAY NURSERIES SERVICES

GUIDELINES

Guidelines address desired levels of performance and are not compulsory. They have been reviewed with concern should they become standards and only those have been highlighted.

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GUIDELINE	COMMENT
PG-04.1 Although groups of children should not be required to rest longer than the times stated in the standards, an individual child should be permitted the amount of uninterrupted sleep he or she requires. Children unable to rest should be permitted to engage in quiet activities.	If children were allowed to engage in quiet activities other than sleep, extra staff would be required to supervise them. In our centres, the rest time allows for staff lunch break and only skeleton staff is on program at that time of the day.

* * *

GUIDELINE	COMMENT
PPG-04.19 (p.A-9) If services are not shared with other building users, provision should be made for a mechanical and caretaking room for heating equipment, a humidifier, a dehumidifier, a hot water storage tank and electrical services and for storing building maintenance equipment, tools and supplies and grounds equipment (e.g. lawnmower, hose, garden tools, snow shovels). This service room should be at ground level, and should be kept locked at all times.	O.M.S.S.A. would like to see the part of the guideline regarding service and storage rooms being locked at all times become a standard. We would see nothing wrong with this as in the majority of cases, in our centres, this is done to prevent theft or vandalism. In the guidelines Section PP-05 - Equipment and Furnishings, O.M.S.S.A. has suggested that many of the equipment items required for the proper operation of day nurseries itemized in this guideline be introduced as standards. We disagree with this. These items are generally found and if they became mandatory under a standards system, could greatly increase the cost of many day nurseries. Having read

cont'd

COMMENT (cont'd)

the items referred to here, we can find none that are not available in Halton's day care centres and simply support the fact that guidelines may eventually become practise and the need for immediate standards is not necessary.

Finally, O.M.S.S.A. recommends that a standard be introduced which sets out minimum qualifications for a day nursery cook. We disagree with this position and feel that the current method of hiring and assessing cooks is sufficient without introducing qualifications standards which quite obviously would end up in increased costs.

* * *

APPENDIX I

PROGRAM STAFF/CHILD RATIOS AND GROUP SIZE

The ratios indicate the number of full-time equivalent * staff required according to the number of children enrolled on a group basis.

a) Normally Functioning Children

		Option A		Option B	
	Age of Child	Ratio	(Group Size)	Ratio	(Group Size)
Full Day Program	birth to 18 months	1:3	(9)	1:4	(8)
	18 months to 30 months	1:4	(12)	1:5	(10)
	2½ years to 5 years	1:8	(24)	1:8	(16)
	if 2½ to 3½ years only	1:7	(21)	1:7	(14)
	5 years	1:12	(24)	1:12	(24)
	6 years to 9 years	1:15	(30)	1:15	(30)
Half-Day Program	birth to 18 months	1:3	(9)	1:4	(8)
	18 months to 30 months	1:4	(12)	1:5	(10)
	2½ years to 5 years	1:8	(24)	1:8	(16)
	5 years	1:12	(24)	1:12	(24)
	6 years to 9 years	1:15	(30)	1:15	(30)

b) Handicapped Children

	2 years to 6 years	1:4	(12)	1:4	(12)
	6 years to 18 years	1:3	(12)	1:3	(12)

c) Integrated Day Care Centre

Ratios to be calculated separately according to the number of handicapped and normal children enrolled.

*For parent-participation co-operatives, two parents present at one time shall be equated with one staff member.

APPENDIX II

GLOSSARY OF TERMS

Administrator or Director	A person who plans and directs the program of a day nursery where more than 45 children are enrolled (more than 32 if the children are handicapped), and is not included in program staff for the purpose of determining the program staff/child ratio.
Approved Corporation	A corporation that has been approved to operate a day nursery under section 6 of The Day Nurseries Act and is specified in the regulations under the Act or is a member of a class prescribed in the regulations.
Assessment	A process whereby a child's physical, intellectual, social and emotional growth at a given time is measured and expressed according to a sequence of developmental norms established for the major developmental areas including gross-motor, fine-motor, perception, receptive and expressive language and behaviour; and a summary is provided of the child's functioning in the foregoing areas as related to his or her psychological environment, together with recommendations for an individual program/plan.
Charitable Corporation	A corporation without share capital having objects of a charitable nature: a) to which Part III of The Corporations Act applies or b) that is incorporated under a general or special Act of the Parliament of Canada

Day Care Centre	A day nursery that enrolls children under ten years of age for a full eight-hour day on more than one day a week and for more than eight consecutive weeks at a time, but itself may be open for more than eight hours a day.
Day Nursery	The generic term used to define a premises that receives more than five children who are not of common parentage, primarily for the purpose of providing temporary care, or guidance, or both temporary care and guidance, for a continuous period not exceeding 24 hours, where the children are under 18 years of age in the case of a day nursery for children with a developmental handicap, and under ten years of age in all other cases, or under twelve years in special circumstances.
Developmental Centre	A day nursery that exclusively enrolls children with a developmental handicap, from six through seventeen years of age.
Developmental Handicap	A condition of mental impairment, present or occurring during a person's formative years, that is associated with limitations in adaptive behaviour verified by objective psychological or medical findings.
Handicapped Child	A child who has a physical or mental impairment that is likely to continue for a prolonged period of time, and who as a result is limited in normal living activities, as verified by objective psychological or medical findings and includes a child with a developmental handicap.

Identifiable Authority	A designated body or person within an organization who has responsibility for the management of programs under The Day Nurseries Act and oversees their day-to-day operations.
Individualized Training Plan	A written individual training and treatment plan, based on a team assessment of specific behaviours and skills, stating the objectives for a handicapped child in sequential, time-dated measurable goals, and reviewed and revised at least once a month.
Individual Program Plan	A time-framed plan of intervention based on a variety of observations, assessments and reports on a child, pinpointing areas in which future growth would occur (long-term goals), and facilitating the implementation of a current individual training/treatment plan, preferably written by a team of people who have worked with the child, involving the child's parents, to be reviewed and revised every six months to one year.
Infant	A child from birth to 18 months of age.
In-Home Service	Service for a child in the child's own home, or in a place other than the child's own home where the child is receiving residential care. A qualified resource teacher visits a handicapped child on a regular basis for the purpose of teaching the child's parents or other caregiver techniques for carrying out a developmental program for the child.

Integrated Day Nursery	A day nursery that enrolls both handicapped and normal children.
Nursery for the Developmentally Handicapped	A day nursery that exclusively enrolls children with a developmental handicap from two through five years of age.
Nursery for the Physically Handicapped	A day nursery that exclusively enrolls physically handicapped children from two through five years of age.
Nursery School	A day nursery that enrolls children from 30 months through five years of age, for a half day on more than one day in a week and for more than eight consecutive weeks at a time.
Operator	A person who has control or management of a day nursery or a private-home day care agency.
Parent	A person with whom a dependent child resides and upon whom the child is dependent for support and maintenance.
Private-Home Day Care	Temporary care, under the supervision of a private-home day care agency, for reward or compensation for a period not exceeding 24 hours of five or fewer children under ten years of age in a private residence other than the home of a parent or guardian of any of the children.

Private-Home Day Care Agency	A person who provides private-home day care at more than one location.
Private-Home Day Care Visitor	A person in the employ of (or under contract to) a private-home day care agency who selects homes where private home day care is to be provided, and supervises and guides private-home day care providers in the implementation of its program.
Program	A combination of individual and group activities planned and implemented to enable each child in the program to achieve normal functioning levels to the degree possible in physical, social, emotional and cognitive development.
Program Staff	Persons who are directly responsible for the developmental aspects of a day nursery program.
Resource Teacher	A person with special training in teaching handicapped children in an integrated centre.
School-Age Centre	A day nursery that enrolls children from six through nine years of age, for care before and after school, during lunch hours and on school holidays.

Supervisor	A person who plans and directs the program of a day nursery, is directly in charge of the children, and is included in program staff for the purpose of determining the program staff/child ratio.
Team Assessment	A team assessment of a child's physical mental, social and emotional growth performed by a team of specialists including at least three of the following: - pediatrician - public health nurse - psychiatrist - registered psychologist - speech therapist - occupational therapist - early childhood education consultant - educational consultant - psychometrist - physiotherapist - kinesiologist, or - audiologist. (Note: list under review and subject to change.)
Toddler	A child between 18 months and 30 months of age.